

**REMARKS**

Applicant appreciates the Examiner's thorough consideration provided the present application. Claims 8-13 are now present in the application. Claims 8-11 have been amended. Claims 12 and 13 have been added. Claims 8 and 10 are independent. Reconsideration of this application, as amended, is respectfully requested.

**Claim Rejections Under 35 U.S.C. § 103**

Claims 8-11 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Sallee, U.S. Patent No. 5,976,643, in view of Constantinescu, U.S. Patent Application Publication No. US 2002/0113346. This rejection is respectfully traversed.

A complete discussion of the Examiner's rejection as set forth in the Office Action, and is not being repeated here.

While not conceding to the Examiner's rejections, but merely to expedite prosecution, as the Examiner will note, independent claims 8 and 10 have been amended to recite a combination of elements including "said laying board having a pair of guide grooves formed in a peripheral wall part of said each root portion pot at positions opposing to each other through the opening of said root portion pot" and "an inner diameter of said root portion pot is narrower than a horizontal distance between the pin tips of the pin member, each of said guide grooves is a recess extending in a vertical direction and through said laying board, and the pair of guide grooves is formed so as to reach depthwise to the bottom part of the root portion pot." Support for the above combination of elements as set forth in amended independent claims 8 and 10 can be found at least in FIGs. 7, 9, 10 and 12-14 as originally filed. Applicant respectfully submits that the above combination of

elements set forth in claims 1 and 8 is not disclosed or suggested by the references relied on by the Examiner.

In particular, the Examiner referred to Sallee's extendable ribs 46 of the rivet 40 shown in FIG. 7 as the guide grooves of the claimed invention. However, Sallee's extendable ribs 46 are not *recesses extending* in a vertical direction and *through the laying board 100*. In fact, each of Sallee's extendable ribs 46 is simply a physical element located above the laying board 100 (see FIG. 10). Therefore, Sallee fails to teach "said laying board having a pair of guide grooves formed in a peripheral wall part of said each root portion pot at positions opposing to each other through the opening of said root portion pot" and "*each of the guide grooves is a recess extending in a vertical direction and through the laying board*" as recited in amended claims 8 and 10.

In addition, although the Examiner referred to Sallee's extendable ribs 46 of the rivet 40 shown in FIG. 7 as the guide grooves of the claimed invention, the extendable ribs 46 only extend to the middle portion of the rivet 40, but do not reach depthwise to the bottom part of the rivet 40. Therefore, Sallee also fails to teach "the pair of guide grooves is formed so as to reach depthwise to the bottom part of the root portion pot" as recited in amended claim 8 and 10.

Furthermore, as embodied in FIG. 7 of the present application, the inner diameter of the root portion pot 6 is *narrower* than a horizontal distance between the pin tips of the pin member 7. Because the inner diameter of the root portion pot 6 is narrower than a horizontal distance between the pin tips of the pin member, by forcibly fitting a root portion of the imitation lawns into the root portion pots, the root portion pots can fix the root portion of the imitation lawns so that the imitation lawns can project upward from the laying board and will not extend laterally or become flattened.

However, the inner diameter of Sallee's rivet 60 (i.e., the diameter of the cavity 45 of the rivet 60 is *substantially the same* as the segment 62 of the lock pin 60. Therefore, Sallee fails to teach "an inner diameter of said root portion pot is narrower than a horizontal distance between the pin tips of the pin member" as recited in amended claims 8 and 10, not to mention the fact that there is only a single pin tip 66 on the lock pin 60. In fact, even if there were two pin tips on the lock pin 60, assuming *arguendo*, when applying the pair of the pin tips of the lock pin 60 into the cavity 45, the diameter of the cavity 45 of the rivet 60 is either *substantially the same* as or larger than a horizontal distance between the pin tips; otherwise, the pair of the pin tips cannot be accommodated by the cavity 45.

In addition, the laying board of the present invention has a pair of guide grooves formed in a peripheral wall part of the each root portion pot at positions opposing to each other through the opening of the root portion pot. Upon the driving of the bifurcate pin member onto the bottom part of the root portion pot, the pair of guide grooves specifies the drive positions of both pin tips of the pin member and also guides both pin tips to the bottom part of the root portion pot. Without the pair of guide grooves, both pin tips of the bifurcate pin member cannot be precisely driven onto the bottom part of the root portion pot.

The pair of guide grooves enables the bifurcate pin member to forcibly fit the root portion of the imitation lawns onto the bottom part of the root portion pot reliably and firmly. Because of the pair of guide grooves and the root portion pot, artificial lawns can be easily produced with a simple construction and inexpensive price. Those features are clearly absent from Sallee.

With regard to the Examiner's reliance on Constantinescu, this reference has only been relied on for its teachings related to the pin tips. This reference also fails to disclose the above

combination of elements as set forth in amended independent claim 8 and 10. Accordingly, this reference fail to cure the deficiencies of Sallee.

Accordingly, neither of the utilized references individually or in combination teaches or suggests the limitations of amended independent claims 8 and 10. Therefore, Applicant respectfully submits that amended independent claims 8 and 10 clearly define over the teachings of the utilized references.

In addition, claims 9 and 11 depend, either directly or indirectly, from independent claims 8 and 10, and are therefore allowable based on their respective dependence from independent claims 8 and 10, which are believed to be allowable.

In view of the above remarks, Applicant respectfully submits that claims 8-11 clearly define the present invention over the references relied on by the Examiner. Accordingly, reconsideration and withdrawal of the rejection under 35 U.S.C. § 103 are respectfully requested.

#### **Additional Claims**

Claims 12 and 13 have been added for the Examiner's consideration. Applicant respectfully submits that claim 12 and 13 respectively depend from amended independent claim 8 and 10, and are therefore allowable based on their respective dependence from amended independent claims 8 and 10, which are believed to be allowable. Consideration and allowance of claims 12 and 13 are respectfully requested.

**Conclusion**

All the stated grounds of rejection have been properly traversed and/or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider all presently pending rejections and that they be withdrawn.

It is believed that a full and complete response has been made to the Office Action, and that as such, the Examiner is respectfully requested to send the application to Issue.

In the event there are any matters remaining in this application, the Examiner is invited to contact the undersigned at (703) 205-8000 in the Washington, D.C. area.

Pursuant to 37 C.F.R. §§ 1.17 and 1.136(a), Applicant respectfully petitions for a one (1) month extension of time for filing a response in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§1.16 or 1.17; particularly, extension of time fees.

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Respectfully submitted,

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